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VIA ECFS

March 7, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554  
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90  
Rural Broadband Experiment Expression of Interest – Rate-of-Return Areas  
Tri-County Telephone Company**

Dear Ms. Dortch:

Tri-County Telephone Company (SAC 401726) (Tri-County) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America funding.<sup>1</sup> Tri-County is a rate-of-return incumbent local exchange carrier serving rural areas of Arkansas, and proposes deployment as follows.

As a franchised ILEC, Tri-County has already constructed and operates a broadband network making broadband services available to about 95% of its customers. Part of the remaining 5% are located in the Boston Mountains which has very rugged terrain with an elevation change from the high point to the low point of about 2,000 feet. Tri-County has shown good faith in providing broadband service by reaching 95% of its customers with those services even though its customer density is less than 1 access line per sheath mile of cable. The Company has investigated the various ways to deliver reliable broadband with transmission speeds of at least 4 Mbps downstream/ 1 Mbps upstream to the remaining 5% and has determined that the most prudent way is to provide broadband over DSL. Without additional support like what is proposed in the Rural Broadband Experiment, individuals and small businesses located in these rural areas will not have access to broadband.

Proposed Service Area

Tri-County proposes to build out broadband to 163 unserved premises within its regulated service territory in Arkansas.

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<sup>1</sup> See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

Proposed Broadband Service

Voice and Broadband services with broadband transmission speeds of 4 Mbps downstream/ 1 Mbps upstream provided over DSL.

Funding

Tri-County estimates construction costs to be a total of \$7,285,375. Tri-County requests this amount in funding from Connect America Funds in one-time funding and will fund the remaining capital and ongoing expenses to operate the system.

Tri-County expects service to be offered to all unserved customers within two years after construction starts.

Tri-County appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned at 870-336-2345 or [john.strode@rittercommunications.com](mailto:john.strode@rittercommunications.com) should you have any questions or need any additional information.

Sincerely,  
TRI-COUNTY TELEPHONE COMPANY

A handwritten signature in black ink, appearing to read "John Strode", with a stylized, flowing script.

John Strode  
Vice President